



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

September 29, 2025

Via Email

Kathryn Leonard
State Historic Preservation Officer
1110 W Washington Street, STE 100
Phoenix, AZ 85007
kleonard@azstateparks.gov

Re: Request for consultation and concurrence on Area of Potential Effects and finding of “No Historic Properties Affected” under Section 106 of the National Historic Preservation Act for the Brownfield Clean-up at 30 Main Street in Bisbee, Arizona

Dear Kathryn Leonard:

The United States Environmental Protection Agency (EPA) Region 9 requests Section 106 consultation under the National Historic Preservation Act (NHPA), 54 U.S.C. § 100101 *et seq.*, and 36 C.F.R. § 800.3(c)(3), with the State Historic Preservation Officer (SHPO) regarding environmental clean-up activities at 30 Main Street in Bisbee, Arizona (the “Project”). We also request concurrence of EPA’s delineation of the area of potential effects and concurrence with EPA’s finding of “No Historic Properties Affected.” See Figure 2.

Background

The structure at 30 Main Street in Bisbee, AZ suffered extensive fire damage in 2024. A limited Asbestos-containing Materials (ACM) and lead-based paint (LBP) Survey of accessible portions of the fire damaged structure was completed in March 2024. The hazardous building materials cleanup will consist of ABM and LBP abatement. Complete removal of ACM will occur by removal of ash and fire debris that is on the floor of the surviving downstairs rooms, wall cavities and crawlspace. LBP will be abated from small areas of painted surfaces in remaining downstairs rooms. Efforts will be made to keep the exterior colors similar to their present colors and the building is not expected to be noticeably different from its present appearance. However, due to the fire damage, and nothing remaining of the second story, that portion of the building will not be rebuilt. Ground-disturbing activities are not planned for this project.

Description of Undertaking

EPA's Brownfields grants are designed to assist communities in assessing, cleaning up and facilitating the revitalization of sites that are contaminated or are suspected of being contaminated. In 2023, the EPA awarded a Brownfields Cleanup Revolving Loan Fund (RLF) grant to Cochise County. The subject property at 30 Main Street was designated by the County to receive a portion of the grant money in the form of a subgrant for abatement/removal of hazardous building materials.

Pursuant to 36 C.F.R. § 800.16(y), undertaking means a project, activity or program funded in whole or in part under the direct or indirect jurisdiction of a federal agency, including those carried out by or on behalf of a federal agency; those carried out with federal financial assistance; and those requiring a federal permit, license, or approval. The award of a Brownfields grant falls squarely within the definition of undertaking.

Area of Potential Effects (APE)

In accordance with 36 C.F.R. § 800.4(a)(1), EPA has delineated and documented the APE (shown on attached Figure 2). The proposed APE for the 30 Main Street is defined as the footprint of the structure located at 30 Main Street, encompassing approximately 1,300 square feet. The structure at 30 Main Street, constructed circa 1900, is sited in the center of Bisbee's historic commercial core and is in the Bisbee Historic District. Its facade fronts Main Street, a narrow two-way street lined with sidewalks and one-to three-story commercial buildings, and its rear (south) elevation faces Commerce Street, a narrow, unmarked two-way street. The building directly abuts commercial buildings to the east and west. The one-story building has a rectangular plan and is clad in brick. The building was historically two stories, but the second story was destroyed in the 2024 fire. The building's roof was historically flat with a parapet; currently, the building has no roof but is enclosed by the floor of its nonextant second story. All abatement/removal of hazardous building materials will occur on the structure. All vehicle access and staging will occur on the nearby roadways.

Public Involvement and Consultation with Tribes

On February 12, 2025, EPA sent letters to request input from local organizations and tribes listed below with the potential to have an interest in the project. The input we received from these organizations stated that they had no input, or they determined the undertaking would have a "No Adverse Effect" to tribal cultural heritage resources and/or Traditional Cultural Properties. In addition, the public has had the opportunity to review and comment on this cleanup project and the Analysis of Brownfields Cleanup Alternatives (ABCA) during a comment period that started on July 28, 2025.

Tribes: Hopi Tribe, Pueblo of Zuni, Tohono O'odham Nation, White Mountain Apache Tribe, San Carlos Apache Tribe, Pascua Yaqui Tribe, Fort Sill Apache Tribe, Mescalero Apache Tribe

Interested Parties: Zacatecas Engineering PLLC, SEAGO, Step Up Bisbee/Naco, Freeport-McMoRan

EPA Analysis and Determination

EPA has determined (based on the information provided in the attached cultural resource assessment report) that the structure at 30 Main Street is not eligible for listing in the National Register of Historic Places, individually or as a contributing resource to the Bisbee Historic District, due to 2024 fire damage that resulted in a subsequent loss of historic materials and the structure lacking integrity.

Since there are no historic properties in the APE, as described above, the EPA has determined no historic properties will be affected by this undertaking in accordance with 36 C.F.R. § 800.4(d)(1).

We request your concurrence of EPA's delineation of the APE and the determination of "No Historic Properties Affected" within 30-days of electronic receipt of this letter. If the SHPO does not respond within the 30-day time frame, EPA will proceed with the project in accordance with 36 C.F.R. § 800.4(d)(1)(i).

If you have questions or require further information regarding this undertaking, please contact Scott Stollman at 415-972-3729 or stollman.scott@epa.gov.

Sincerely,

Michael Olokode, Assistant Director
Land, Chemicals and Redevelopment Division

Attachments: Figure 1 – Project Location
Figure 2 – Location of APE
30 Main Street, Bisbee, AZ Cultural Resource Assessment Report